

Exhibit 16

RAMON K. QUICHOCHO, ESQ., FO243
LAW OFFICES OF RAMON K. QUICHOCHO, LLC
2nd Floor, V.S. Sablan Building, Chalan Piao
P.O. Box 505621
Saipan, MP 96950
Telephone No. (670) 234-8946
Facsimile No. (670) 234-8920
Email: rayq@pticom.com



E-FILED
CNMI SUPERIOR COURT
E-filed: May 29 2007 2:23PM
Clerk Review: May 30, 2007
Filing ID: 15025497
Case Number: 06-0119-CV
Elsa Duenas

A handwritten signature in black ink, appearing to be "Elsa Duenas".

MICHAEL W. DOTTS, ESQ., F0150
O'CONNOR BERMAN DOTTS & BANES
2nd Floor, Nauru Building
P.O. Box 501969
Saipan, MP 96950
Telephone No. (670) 234-5684
Facsimile No. (670) 234-5683
Email: attorneys@saipan.com

Attorneys for Plaintiff
JOAQUIN Q. ATALIG

**IN THE SUPERIOR COURT
OF THE
COMMONWEALTH OF THE NORTHERN MARIANA ISLANDS**

JOAQUIN Q. ATALIG,

Plaintiff,

vs.

**OKP (CNMI) CORPORATION,
BRIAN M. CHEN, PRASADA REDDY
GOLUGURI, PRAMUAN
JAIPHAKEE, WILAI PROMCHAI,
COMMONWEALTH PORTS
AUTHORITY, and REGINO M. CELIS,
in his capacity as Acting Executive
Director of the Commonwealth Ports
Authority, and DOES 1-3,**

Defendants.

CIVIL CASE NO. 06-0119(R)

**ANSWER TO COUNTERCLAIM
ASSERTED BY BRIAN M. CHEN**

COMES NOW Joaquin Q. Atalig, and in answer to the Counterclaim asserted by Brian M. Chen, states as follows:

1. Counter-defendant admits the allegations contained in paragraphs 1, 2, 3 and 4 of the Counterclaim.

2. With regard to paragraphs 5, 6, 7 and 8, these paragraphs assert legal conclusions and legal arguments and on that basis are denied. To the extent documents are quoted in these paragraphs, the documents speak for themselves. The Second Amended Complaint speaks for itself as to what has been alleged.

3. Counter-defendant denies the allegations made in paragraphs 9 and 10.

4. Counter-defendant denies that Counter-plaintiff is entitled to the relief paid for in the Counterclaim.

AFFIRMATIVE DEFENSE

For his Affirmative Defenses, Counter-defendant asserts:

- a. Counter-plaintiff has unclean hands.
- b. Counter-plaintiff has failed to mitigate damages.

c. Counter-defendant asserts that the causes of action and factual assertions made in the underlying Second Amended Complaint preclude an award to Counter-defendant on the Counterclaim.

JURY DEMAND

Plaintiff hereby demands a jury trial on the Counterclaim.

Dated: May 29, 2007

Respectfully submitted,

O'CONNOR BERMAN DOTTS & BANES

By: /s/
Michael W. Dotts, Esq.